

STATE OF MINNESOTA)
) ss. AFFIDAVIT OF NICHOLAS BRADT
COUNTY OF RAMSEY)

1. I am a “federal law enforcement officer” within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(C), that is, a government agent engaged in enforcing the criminal laws and duly authorized by the Attorney General to request a search warrant. I have been a Special Agent with The Bureau of Alcohol, Tobacco, Firearms, and Explosives (“ATF”) since June of 2018. As an ATF Special Agent, I attended and successfully completed the Criminal Investigator Training Program at the Federal Law Enforcement Training Center in Glynco, Georgia. I also successfully completed the ATF Special Agent Basic Training Program. I have been trained to conduct state and federal criminal investigations. I work as an ATF special agent in the Saint Paul Field Division, Group IV. I am currently assigned to the Hennepin County Violent Offender Task Force (“VOTF”). My duties include, but are not limited to, the investigation of violations of the federal firearms, arson, explosives laws, and other federal laws and regulations of the United States of America. In connection with my official ATF duties, I investigate criminal violations of federal firearms and narcotics laws. Prior to working with the ATF, I was a Washington County, Minnesota, deputy sheriff for over four years. During those years I worked as a patrol deputy, enforcing state laws,

and investigating criminal activity.

2. This affidavit is submitted for the limited purpose of establishing probable cause in support of issuing a complaint and arrest warrant for Marquez Demar HILL-TURNIPSEED for unlawful possession of a machinegun, in violation of Title 18, United States Code, Section 922(o)(1) and 924(a)(2).

3. This affidavit is based on my personal knowledge, as well as information I have learned from other law enforcement officers and the review of reports, written materials, and recordings. This affidavit does not include all of the details I have learned regarding this investigation. Rather, it only includes information believed to be sufficient to establish probable cause.

PROBABLE CAUSE

a. *The Investigation of HILL-TURNIPSEED.*

4. The “Lows” is a north Minneapolis criminal gang that engages in drug trafficking, firearm possession, and acts of violence. HILL-TURNIPSEED is known member of the Lows who consistently posts photographs and videos of himself with other documented members of the Lows. These other members are often brandishing firearms.

5. In April of 2023, I received information from an ATF confidential informant (CI) that several individuals associated with the “Lows” possessed firearms and sold controlled substances out of a townhome residence located

at 67XX Grimes Place North in Brooklyn Center, Minnesota (the Subject Premises). The CI stated that HILL-TURNIPSEED resided there. Detectives of the Hennepin County Sheriff's Office (HCSO) spoke with management of the townhome and learned that the tenants moved in early March of 2023. In approximately six weeks since the tenants moved in, the management received four safety complaints from other tenants at the townhome complex. These complaints were for open drug use, drug sales, and the possession of firearms by the tenants of the Subject Premises and their guests. Neighbors told management that they had seen drug deals. They also stated that tenants from the Subject Premises also shut down part of the parking lot to use and sell drugs.

6. In April of 2023, HCSO detectives obtained a rental agreement for the Subject Premises. According to the rental agreement the Subject Premises are rented by a woman with the initials L.M. According to a law enforcement database, within the last year L.M. has had eight residences associated with her name. In my training and experience I know that it is common for individuals associated with illegal activity to have another individual—often a woman—rent a residence under her name to avoid the detection of law enforcement, including probation officers. I was unable to find any direct connection between L.M. and HILL-TURNIPSEED.

7. In April and May of 2023 I began conducting physical and video

surveillance of the Subject Premises. HILL-TURNIPSEED was seen several times on surveillance going in and out of the Subject Premises. Surveillance also captured other individuals associated to the Lows gang frequent the Subject Premises.

8. On or about April 22, 2023, surveillance video captured HILL-TURNIPSEED exit the Subject Premises and walk to the parking lot. The footage does not show where HILL-TURNIPSEED walked, but it appeared that HILL-TURNIPSEED was meeting with a person or vehicle in the parking lot. As he did so, another individual, later identified as a man with the initials P.A., also exited the Subject Premises and stood under the awning of the townhome. P.A. held what appeared to be a firearm in his waistband—what appears to be the butt of a firearm is visible in the surveillance video. P.A. is a known member of the Lows gang who has two arrests for possession of a pistol without a permit. In my training and experience I know that traffickers of controlled substances will often have a second individual deal with them or stand watch for them to prevent being or retaliate against being robbed.

9. Surveillance was able to capture high levels of foot traffic in and out of the Subject Premises. In my training and experience I know that high levels of come-and-go traffic often indicate trafficking of controlled substances. Guests would stay anywhere from a few minutes to a few hours.

10. In May of 2023, the ATF CI accompanied another male on two

occasions to the Subject Premises. On both occasions the other male purchased marijuana at the Subject Premises. On one of the occasions an individual came out and met with CI and the male purchasing marijuana. On the other occasion the male went inside the Subject Premises to purchase marijuana.

11. On or about September 30, 2022, a music video was posted on social media with featuring HILL-TURNIPSEED. The video depicts numerous Lows gang members holding and brandishing firearms. In the course of investigating the Lows I have become familiar with several of the associated gang members and was able to identify numerous individuals in the video. The ATF CI corroborated the identities. Screenshots from the video follow. HILL-TURNIPSEED is in the white sweatshirt with orange lettering wearing a black hat.

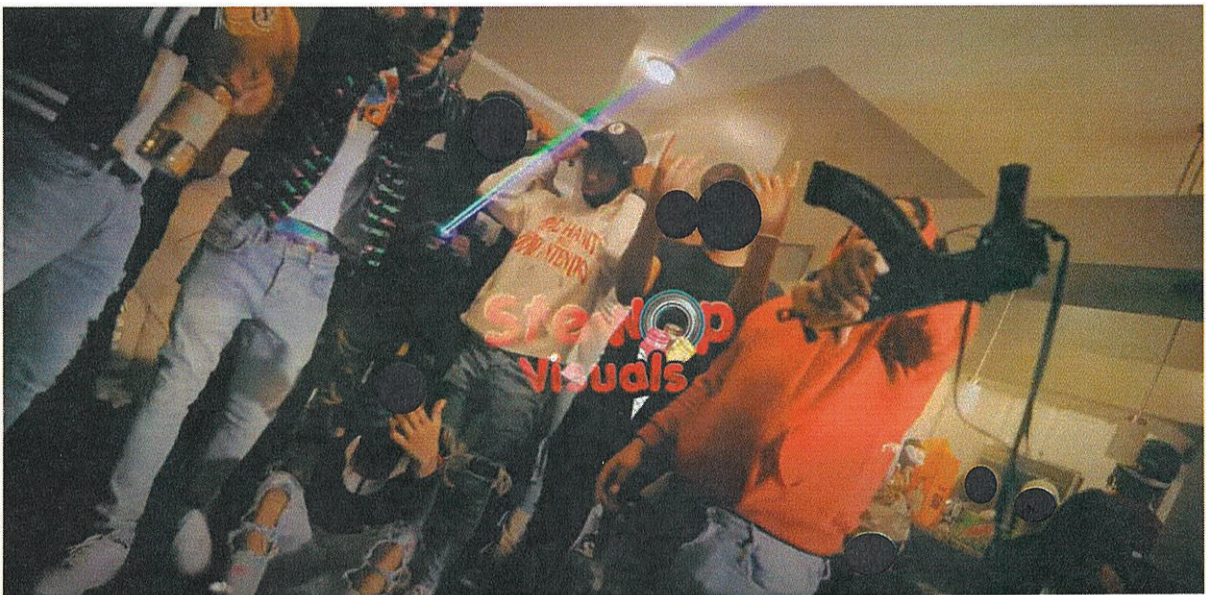


Fig. 1: A still from one of the videos (redacted). HILL-TURNIPSEED is center, wearing a white sweatshirt with orange lettering.

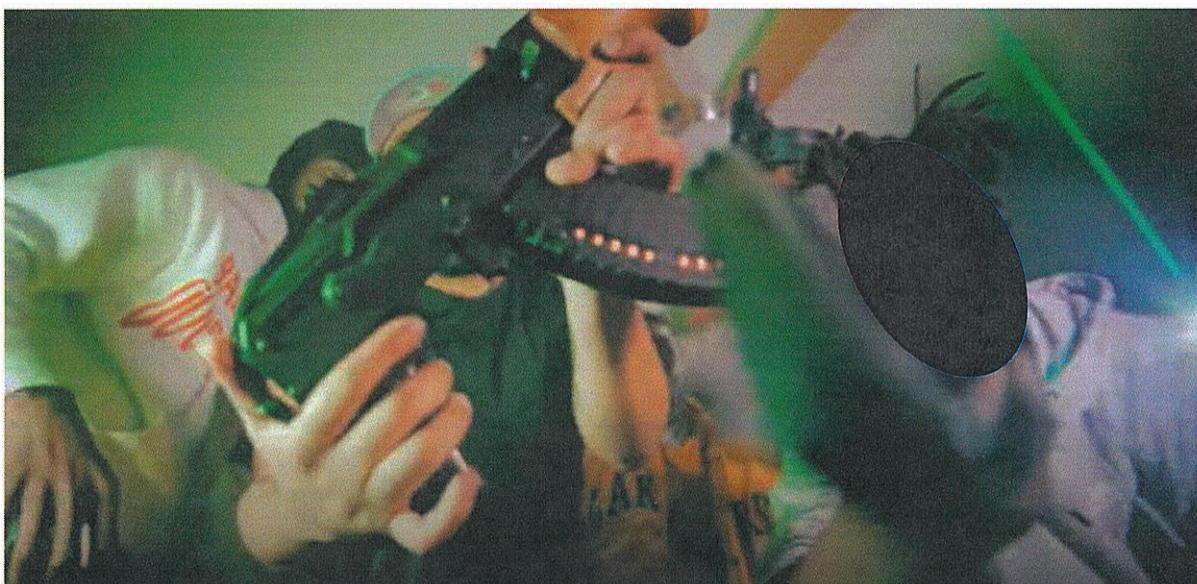


Fig. 2: A still from one of the videos (redacted). HILL-TURNIPSEED is left.



Fig. 3: A still from one of the videos.

12. At the time the videos were made, HILL-TURNIPSEED was a felon who was federally prohibited from possessing firearms (discussed further below).

13. In June of 2023 the ATF CI made contact with an associate of HILL-TURNIPSEED's. The individual directed the ATF CI to drive to a different location from the Subject Premises. In my training and experience I know that it is not uncommon for gang members to have multiple locations to store and distribute controlled substances.

b. *The Search of the Subject Premises.*

14. On June 15, 2023, I obtained a federal warrant to search the Subject Premises. At about 10:25 a.m. on June 29, 2023, ATF and HCSO law enforcement officers searched the Subject Premises pursuant to the warrant.

15. Four individuals were in the Subject Premises: HILL-TURNIPSEED and a man with the initials R.C., a woman with the initials S.G., and a 17-year-old juvenile.

16. In a laundry hamper in the northeast bedroom closet of the Subject Premises, law enforcement officers found a Glock model 30 .45 caliber pistol bearing serial number LYN585. The firearm was equipped with an attached conversion device, commonly known as a "switch" or "auto sear," enabling it to be fired as a fully automatic weapon by a single function of the trigger, which makes the firearm a machinegun as defined by Title 26, United States Code, Section 5845(b). The firearm had a loaded magazine and a round was chambered. Next to the laundry hamper was a "UCare" card bearing HILL-TURNIPSEED's name.

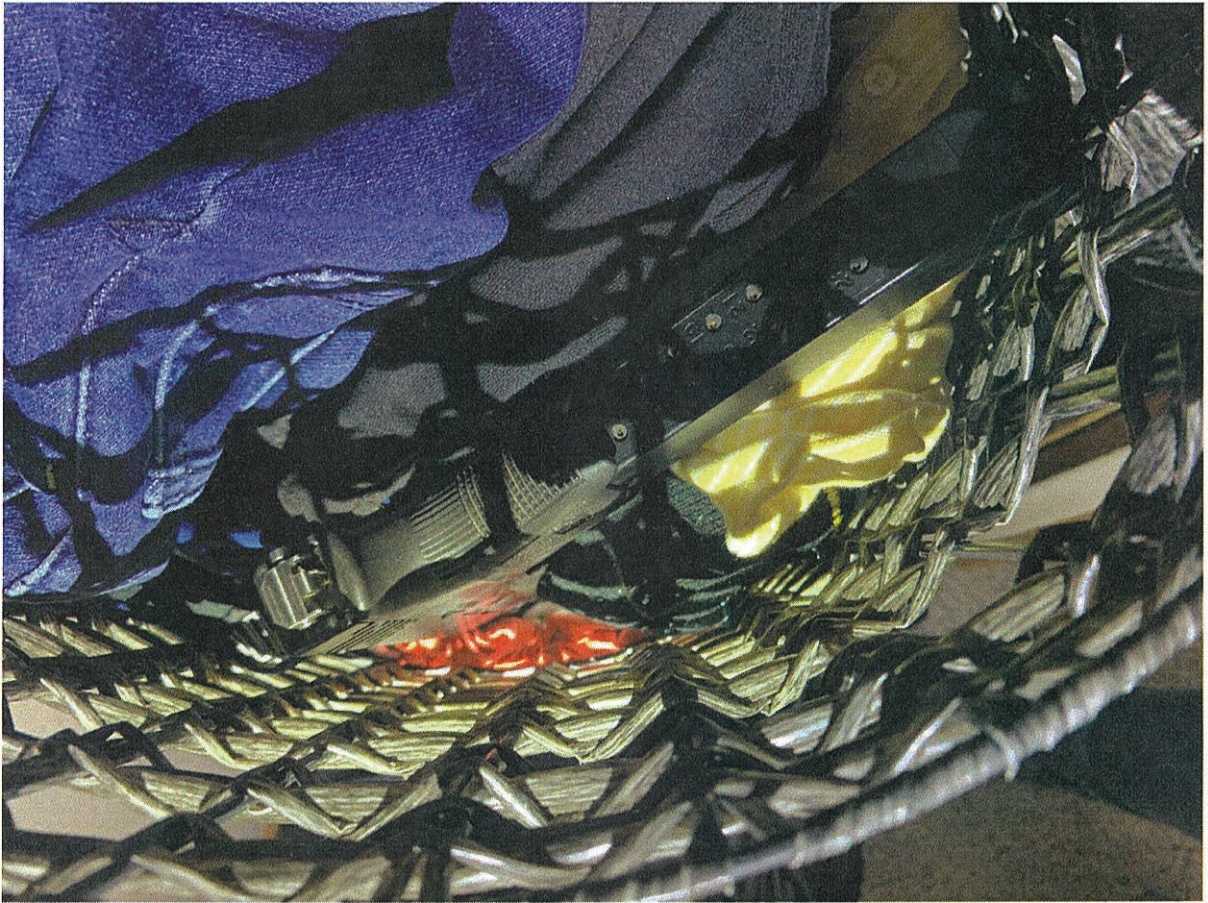


Fig. 4: The firearm with the switch in the laundry hamper.

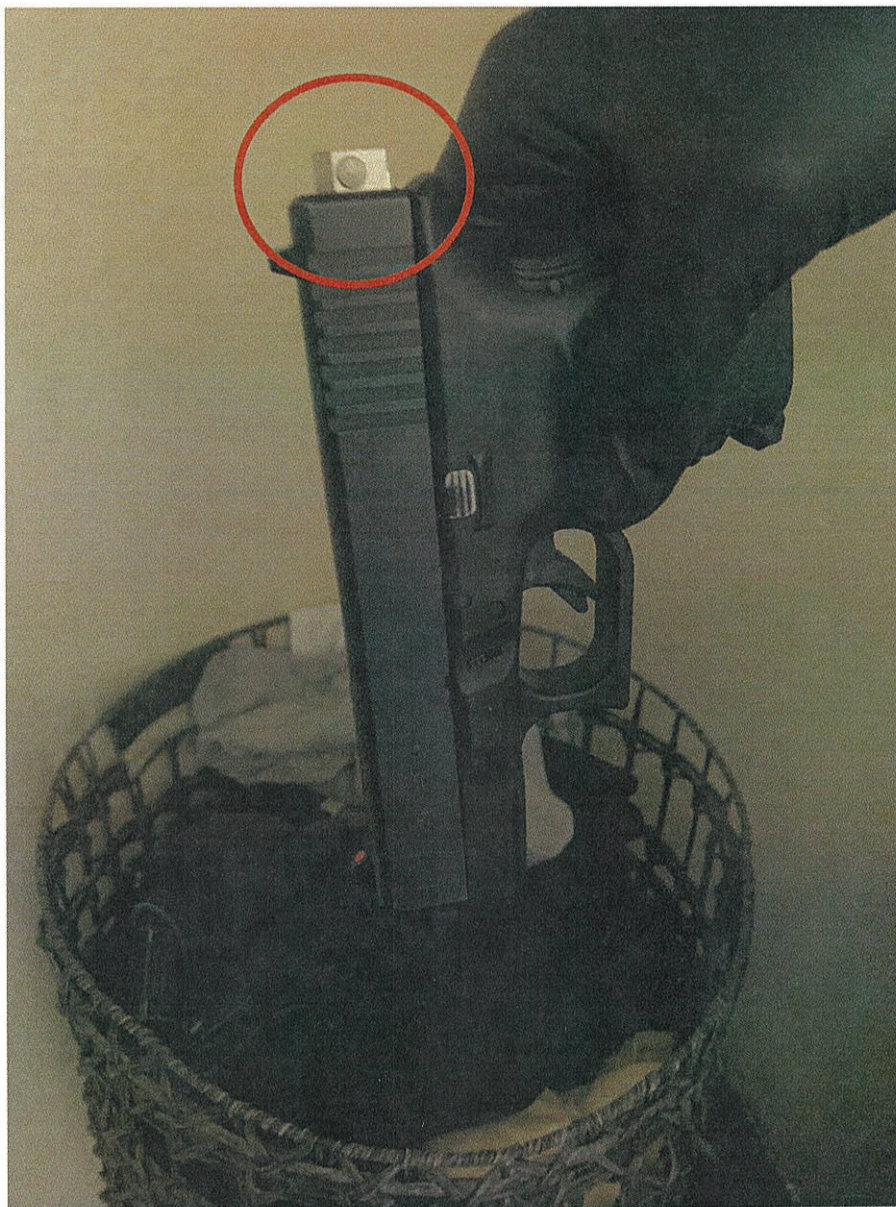


Fig. 5: The firearm with the switch. The switch is circled in red.

17. On the bed law enforcement officers found a P80 privately made firearm with no serial number (sometimes referred to as a “ghost gun”). That firearm was likewise loaded with a round chambered.

18. A diploma bearing HILL-TURNIPSEED’s name was located in the kitchen of the Subject Premises.

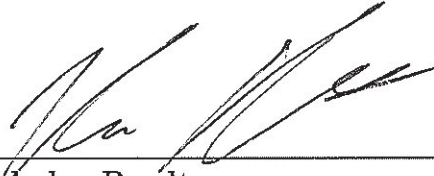
19. When law enforcement officers entered the Subject Premises, HILL-TURNIPSEED was not wearing a shirt or shoes. He asked to get a shirt and shoes from his room prior to being transported to jail. I accompanied HILL-TURNIPSEED upstairs so he could retrieve these effects. When we got upstairs, HILL-TURNIPSEED began to walk into the northeast bedroom where the firearms were found—however he stopped abruptly at the threshold when he saw law enforcement officers in the room. We turned and walked into the bathroom. I reminded him that he had wanted to go to his room to get his effects, and he walked into the northeast bedroom. While he was inside the bedroom, he appeared to conspicuously avoid the hamper in which the firearm with the switch was found. HILL-TURNIPSEED took a shirt that denied was his—however it appeared to fit him. After he retrieved a shirt, he went to a different bedroom and took a pair of Crocs sandals—however, these sandals appeared to fit him tightly.

20. On September 16, 2022, HILL-TURNIPSEED was convicted of Possession of a Machinegun in Hennepin County, Minnesota. In that case, HILL-TURNIPSEED fled a traffic stop in a motor vehicle, traveling as fast as 80 miles per hour in a 35-mph zone. HILL-TURNIPSEED then fled his car on foot, throwing two firearms as he ran. One of these firearms had a switch on it.

21. Based on the information set forth above, there is probable cause


to believe that the Defendant, Marquez Demar HILL-TURNIPSEED, violated Title 18, United States Code, Sections 922(o)(1) and 924(a)(2), by unlawfully possessing a machinegun.

Further your Affiant sayeth not.



Nicholas Bradt
Special Agent, ATF

SUBSCRIBED and SWORN before me
by reliable electronic means via FaceTime
and email pursuant to Fed. R. Crim. P. 41(d)(3) on
June 30, 2023:



ELIZABETH COWAN WRIGHT
UNITED STATES MAGISTRATE JUDGE
DISTRICT OF MINNESOTA